

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division**

RLI INSURANCE COMPANY,

Plaintiff,

v.

Case No.: 5:18-cv-00066-MFU

NEXUS SERVICES, INC., *et al.*,

Defendants.

**APPLICATION FOR REASONABLE LEGAL FEES, COSTS,
AND EXPENSES RESULTING FROM RLI'S POST-JUDGMENT EFFORTS
TO COMPEL NEXUS' COMPLIANCE WITH THE OCTOBER 23, 2020 ORDER**

Plaintiff RLI Insurance Company ("RLI"), by counsel, and in accordance with the Section VI of this Court's August 12, 2021 Order hereby submits its Application for Reasonable Legal Fees, Costs, and Expenses Resulting from RLI's Post-Judgment Efforts to Compel Defendants Nexus Services, Inc., Libre by Nexus, Inc. and Homes by Nexus, Inc.'s (collectively, "Nexus") Compliance with the October 23, 2020 Order.

By its August 12, 2021 Order, the Court, as a civil contempt sanction, entered an Order granting RLI's request for legal fees, costs, and expenses in response to Nexus' failure to comply with the Court's October 23, 2020 Order. *See* ECF No. 721, § VI.

As set forth in the attached Declaration of Vivian Katsantonis, and the supporting exhibits thereto, all of which are incorporated by this reference as though fully set forth herein, RLI has reasonably incurred the following legal fees, costs and expenses in attempting to compel Nexus' compliance with the injunctive relief granted in the October 23, 2020 Order:

- (i) \$439,559.00 in Watt Tieder counsel fees;
- (ii) \$2,368.94 in Watt Tieder costs;

- (iii) \$29,774.02 in forensic accountant fees (Verity, LLC); and
- (iv) \$44,503.01 in Special Master's fees (RLI's 50% share of \$89,006 invoiced).

WHEREFORE, RLI respectfully requests that this Court enter an order and judgment in favor of RLI and against Nexus, awarding to RLI legal fees, costs and expenses in the total amount of \$516,204.97.¹

Executed on: September 13, 2021

/s Vivian Katsantonis
Vivian Katsantonis

¹ RLI may supplement this Application based on our continuing review of fees incurred in reviewing Nexus' books and records production, as provided in Paragraph 32 of the supporting Katsantonis Declaration.

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Vivian Katsantonis
Vivian Katsantonis